

March 12, 2003

**Re: Southern Indiana Chemical, LLC 019-16434-00110**

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

**Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02

**FEDERALLY ENFORCEABLE  
STATE OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Southern Indiana Chemical Resource, LLC  
10600 Highway 62  
Charlestown, Indiana 47111**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F019-16434-00110	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 11, 2003  Expiration Date: March 11, 2008

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**Certification Form**

**Emergency Occurrence Form**

**Quarterly Report Form, Worst Case Single HAP**

**Quarterly Report Form, Combined HAPs**

**Quarterly Deviation and Compliance Monitoring Report Form**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary commercial liquid storage and transfer operation.

Authorized individual:	Paul Knowlson
Source Address:	10600 Highway 62, Charlestown, Indiana 47111
Mailing Address:	3375 Merriam Avenue, Muskegon, Michigan 49444
General Source Phone:	317-737-3400
SIC Code:	4226
County:	Clark
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading system, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanalamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year;

and

- (b) One (1) raw material liquid storage system including:

- (1) the Midwest Storage Area, with a maximum design throughput of 7,501,859 gallons per year, consisting of:

- (A) One (1) 342,005 gallon vertical raw material storage tank, identified as Tank 10, and  
(B) Two (1) 67,682 gallon vertical raw material storage tanks, identified as Tanks 11 and 12,

with the worst case material stored being propylene glycol.

- (2) Storage Area 2596, with a maximum design throughput of 4,404,529 gallons per year, consisting of:

- (A) Three (3) 81,218 gallon vertical raw material storage tanks, identified as Tanks 25, 26, and 27, and  
(B) Two (2) 22,533 gallon vertical raw material storage tanks, identified as Tanks 28 and 29,

with the worst case material stored being propylene glycol; and

- (3) Storage Area 305-2, with a maximum design throughput of 10,000,548 gallons per year, including:
- (A) Tank Group 1, consisting of five (5) 81,218 gallon vertical raw material storage tanks, identified as Tanks 51, 52, 71, 72, and 73, with the worst case material stored being propylene glycol,
  - (B) Tank Group 2, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 82, 83, 84, 85, 88, and 89, with the worst case material stored being 2-methoxyethanol,
  - (C) Tank Group 3, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 54, 55, 56, 57, 58, and 59, with the worst case material stored being ethanol,
  - (D) Tank Group 4, consisting of three (3) 67,682 gallon vertical raw material storage tanks, identified as Tanks 38, 39, and 40, with the worst case material stored being morpholine,
  - (E) Tank Group 5, consisting of four (4) 7,520 gallon horizontal raw material storage tanks, identified as Tanks 45, 46, 47, and 48, with the worst case materials stored being propylene glycol for Tanks 45 and 46, 2-methoxyethanol for Tank 47, and ethanol for Tank 48,
  - (F) Tank Group 6, consisting of six (6) 7,520 gallon horizontal storage tanks, identified as Tanks 49, 50, 60, 63, 65, and 66, with the worst case material stored being morpholine, and
  - (G) Tank Group 7, consisting of seven (7) 7,520 gallon horizontal storage tanks, identified as Tanks 76, 77, 86, 87, 96, 97, and 98, with the worst case material stored being morpholine.

#### A.3 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).



**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

**(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]**

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

**(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]**

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- and
- United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

Pursuant to 326 IAC 2-8:

- (a) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (b) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (c) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

#### C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

#### C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is(are) in operation.

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (a) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (b) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

##### **C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

##### **C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

##### **C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading system, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year; and
- (b) One (1) raw material liquid storage system including:
  - (1) the Midwest Storage Area, with a maximum design throughput of 7,501,859 gallons per year, consisting of:
    - (A) One (1) 342,005 gallon vertical raw material storage tank, identified as Tank 10, and
    - (B) Two (1) 67,682 gallon vertical raw material storage tanks, identified as Tanks 11 and 12,with the worst case material stored being propylene glycol.
  - (2) Storage Area 2596, with a maximum design throughput of 4,404,529 gallons per year, consisting of:
    - (A) Three (3) 81,218 gallon vertical raw material storage tanks, identified as Tanks 25, 26, and 27, and
    - (B) Two (2) 22,533 gallon vertical raw material storage tanks, identified as Tanks 28 and 29,with the worst case material stored being propylene glycol; and
  - (3) Storage Area 305-2, with a maximum design throughput of 10,000,548 gallons per year, including:
    - (A) Tank Group 1, consisting of five (5) 81,218 gallon vertical raw material storage tanks, identified as Tanks 51, 52, 71, 72, and 73, with the worst case material stored being propylene glycol,
    - (B) Tank Group 2, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 82, 83, 84, 85, 88, and 89, with the worst case material stored being 2-methoxyethanol,
    - (C) Tank Group 3, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 54, 55, 56, 57, 58, and 59, with the worst case material stored being ethanol,
    - (D) Tank Group 4, consisting of three (3) 67,682 gallon vertical raw material storage tanks, identified as Tanks 38, 39, and 40, with the worst case material stored being morpholine,
    - (E) Tank Group 5, consisting of four (4) 7,520 gallon horizontal raw material storage tanks, identified as Tanks 45, 46, 47, and 48, with the worst case materials stored being propylene glycol for Tanks 45 and 46, 2-methoxyethanol for Tank 47, and ethanol for Tank 48,
    - (F) Tank Group 6, consisting of six (6) 7,520 gallon horizontal storage tanks, identified as Tanks 49, 50, 60, 63, 65, and 66, with the worst case material stored being morpholine, and
    - (G) Tank Group 7, consisting of seven (7) 7,520 gallon horizontal storage tanks, identified as Tanks 76, 77, 86, 87, 96, 97, and 98, with the worst case material stored being morpholine.

## **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

### **D.1.1 Single and Combined Hazardous Air Pollutant (HAP) Limits [326 IAC 2-4.1]**

The owner or operator shall limit the source input single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance being demonstrated at the end of each month.

### **D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

## **Compliance Determination Requirements**

### **D.1.3 Compliance Determination, Single and Combined HAP Limits**

To determine compliance with the limits of Condition D.1.1, the owner or operator shall, on a monthly basis:

- (a) for the loading/unloading area:
  - (1) draft a list of each HAP containing material handled, including for each material, a list of the individual HAPs, and
  - (2) for the individual HAPs listed, determine the emissions for the affected month;
- (b) for each of the source tanks:
  - (1) draft a list of each HAP containing material handled, including for each material, a list of the individual HAPs, and
  - (2) for the individual HAPs listed, determine the emissions for the affected month;
- (c) determine the sum total individual HAP emissions from the loading/unloading area and storage tanks generated during the affected month;
- (d) determine the combined HAP emissions from the loading/unloading area and storage tanks generated during the affected month;
- (e) determine the sum total individual HAP emissions from the loading/unloading area and storage tanks generated during the 11 months preceding the most recent affected month;
- (f) determine the sum total combined HAP emissions from the loading/unloading area and storage tanks generated during the 11 months preceding the most recent affected month;
- (g) determine the consecutive 12 month total for each individual HAP by summing the values determined in Parts (c) and (e) of this Condition;
- (h) determine from the values estimated in Part (g) of this Condition, the highest (worst case) consecutive 12 month total individual HAP emissions; and
- (i) determine the consecutive 12 month total combined HAP emissions by summing the values estimated in Parts (d) and (f) of this Condition.



#### **D.1.4 True Vapor Pressure Determination Methods [326 IAC 8-9-6(i)]**

Where applicable, the owner or operator may use available data on the storage temperature to determine the maximum true vapor pressure for the purposes of Condition D.1.7(b) provided the owner or operator, as applicable, complies with the following requirements:

- (a) The maximum true vapor pressure for VOLs stored at temperatures above or below the ambient temperature shall correspond to the highest calendar-month average storage temperature. The maximum true vapor pressure for VOLs stored at the ambient temperature shall correspond to the local maximum monthly average temperature, as reported by the National Weather Service.
- (b) For local crude oil or refined petroleum products, the maximum true vapor pressure may be determined as follows:
  - (1) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517\* unless the Office of Air Quality specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the samples.
  - (2) The maximum true vapor pressure of each type of crude oil with a Reid vapor pressure less than two (2) pounds per square inch or with physical properties that preclude determination by the recommended method shall be determined from available data and recorded if the estimated maximum true vapor pressure is greater than five-tenths (0.5) psia.
- (c) For other liquids, the maximum true vapor pressure may be determined by any of the following methods:
  - (1) Standard reference texts.
  - (2) ASTM Method D2879-92\*.
  - (3) Calculated or measured by a method approved by the Office of Air Quality.

\* Copies of the Code of Federal Regulations (CFR), ASTM Method D2879-92, ASTM Method D323-82, and API Bulletin 2517 referenced may be obtained from the Government Printing Office, Washington, D.C. 20402 or the Indiana Department of Environmental Management, Indiana Government Center-North, 100 North Senate Avenue, Indianapolis, Indiana 46204-2220.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **D.1.5 Compliance Monitoring, Single and Combined HAP Limits**

To demonstrate compliance with the requirements of Condition D.1.1, the owner or operator shall record the information and values determined in Condition D.1.3.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.1.6 Record Keeping, Single and Combined HAP Limits**

To demonstrate compliance with the requirements of Condition D.1.1, the owner or operator shall keep and maintain:

- (a) records of the information and specific values required in Condition D.1.5; and
- (b) copies of the emission calculations performed each month including the methods used, a list of all parameters used to determine the emissions, material safety data sheets (MSDS) for all materials stored and handled, and all supporting documentation used to verify the amount of each material, including as applicable, purchase and shipping orders and invoices.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Record Keeping, Storage Tanks [326 IAC 8-9-6(a) and (b)], [326 IAC 8-9-6(h)]

- (a) The owner or operator shall, for each tank at the source, keep and maintain a record consisting of the following information:

- (1) the vessel identification number,
- (2) the vessel dimensions, and
- (3) the vessel capacity.

Said records shall be kept for the life of the vessel.

- (b) The owner or operator shall, for all periods when the true vapor pressure of Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, 73, 38, 39, and 40 exceed 0.75 psia:
  - (1) keep an maintain a record of each event, and
  - (2) notify the department within 30 days of each event that the true vapor pressure has exceeded 0.75 psia.

D.1.8 Reporting Requirements, Single and Combined HAP limits

To document compliance with the requirements of Condition D.1.1, the owner or operator shall submit a quarterly summary of the information required in Condition D.1.6. Said summary shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

D.1.9 Reporting, Storage Tanks [326 IAC 8-9-6(b)]

The owner or operator shall submit a one time report containing the information required in Condition D.1.7(a).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Southern Indiana Chemical Resources  
Source Address: 10600 Highway 62, Charlestown Indiana 47111  
Mailing Address: 3375 Merriam Avenue, Muskegon, Michigan 49444  
FESOP No.: 019-16434-00110

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Southern Indiana Chemical Resources  
Source Address: 10600 Highway 62, Charlestown Indiana 47111  
Mailing Address: 3375 Merriam Avenue, Muskegon, Michigan 49444  
FESOP No.: 019-16434-00110

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Southern Indiana Chemical Resources  
Source Address: 10600 Highway 62, Charlestown Indiana 47111  
Mailing Address: 3375 Merriam Avenue, Muskegon, Michigan 49444  
FESOP No.: 019-16434-00110 Source Name:  
Facility: Source Emission Units  
Parameter: Worst Case Single HAP Emissions for the Consecutive 12 Month Period  
Limit: Less Than 10 Tons Per Year per Consecutive 12 Month Period

YEAR: \_\_\_\_\_

Month	Worst Case Single HAP Emissions for the Consecutive 12 Month Period (Tons)
1	
2	
3	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Southern Indiana Chemical Resources  
Source Address: 10600 Highway 62, Charlestown Indiana 47111  
Mailing Address: 3375 Merriam Avenue, Muskegon, Michigan 49444  
FESOP No.: 019-16434-00110 Source Name:  
Facility: Source Emission Units  
Parameter: Combined HAP Emissions for the Consecutive 12 Month Period  
Limit: Less Than 25 Tons Per Year per Consecutive 12 Month Period

YEAR: \_\_\_\_\_

Month	(a) Combined HAP Emissions This Month  (Tons)	(b) Combined HAP Emissions From the Previous 11 Months  (Tons)	(a) + (b) Combined HAP Emissions for the Consecutive 12 Month Period  (Tons)
1			
2			
3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Southern Indiana Chemical Resources  
Source Address: 10600 Highway 62, Charlestown Indiana 47111  
Mailing Address: 3375 Merriam Avenue, Muskegon, Michigan 49444  
FESOP No.: 019-16434-00110 Source Name:

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# **Indiana Department of Environmental Management Office of Air Quality**

## **Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit**

Source Name: Southern Indiana Chemical Resources, LLC  
Source Location: 10600 Highway 62 in Charlestown, IN 47111  
County: Clark  
SIC Code: 4226  
FESOP No.: 019-16434-00110  
Permit Reviewer: SDF

On January 21, 2003, the Office of Air Quality (OAQ) had a notice published in the Evening News, located in Jeffersonville, Indiana, stating that Southern Indiana Chemical Resources, LLC had applied for a FESOP to operate a stationary commercial liquid storage and transfer operation. The notice also stated that the OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 20, 2003, Sci-Tech, Inc., a consultant representing Southern Indiana Chemical Resources, LLC, submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows:

### **1. Comment 1:**

Since the proposed permit limits the emissions from the facility to less than the major source levels and requires quarterly and semi-annual reports of emissions, is it necessary to include a facility throughput limit in Sections A.2 and D.1 of the permit?

#### **Response 1:**

Condition A.2 of Section A lists the units associated with the source, including for each applicable unit, a description of the units, identification of the units, the maximum capacities, and any emission controls used. There are no limits associated with Condition A.2.

Condition D.1.1 does limit the input, but in a manner that results in single and combined HAP "emissions" less than the respective major source levels.

All limits established need to be federally enforceable as a practical matter. In order for a limit to be considered federally enforceable as a practical matter, the owner or operator needs to be able to demonstrate on a more or less continuous basis, that compliance with the limit is achieved.

Limiting the input HAP is necessary because limiting the input provides a parameter that can be measured and recorded, and can be used to demonstrate compliance. Limiting the HAPs on an emissions only basis would only provide a parameter that could be measured and recorded if the emissions themselves were monitored, which in this case, is not practical.

Therefore, to ensure that the limit of Condition D.1.1 is federally enforceable as a practical matter, the limit shall remain the same.

## 2. Comment 2:

If it is necessary to include a facility throughput in Section D.1(a), please revise the permit to reflect that the 11,000,001 gallons per year is the throughput of the Winston Yard and that the throughput of the entire facility is 32,906,937 gallons per year as shown in Table 5, which is located in Section 3 of the permit application package.

### Response 2:

Part (a) of the unit description of Section D.1 and Condition A.2(a) state that the maximum design throughput of the railcar/truck/barge liquid raw material loading/unloading area is 11,000,001 gallons per year.

Southern Indiana Chemical has requested that the entire facility throughput of 32,906,937 gallons per year be reflected as well, and that the 11,000,001 gallon throughput reference be clarified to apply to the Winston Yard only.

The requested changes shall be made by changing Condition A.2 and Part (a) of the unit description of Section D.1 as follows.

(a) Applying the 11,000,001 Gallon Throughput to the Winston Yard Only:

Condition A.2 and Part (a) of the unit description of Section D.1 shall be revised as follows to identify the railcar/truck/barge loading/unloading area as the "Winston Yard".

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading area, **identified as the Winston Yard**, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year;

.....

#### **SECTION D.1 FACILITY OPERATION CONDITIONS**

##### **Facility Description [326 IAC 2-8-4(10)]:**

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading area, **identified as the Winston Yard**, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year; and

.....

(b) Stating That the Source Throughput is 32,906,937 Gallons Per Year:

Condition A.2 and Part (a) of Section D.1 shall be revised as follows to include the maximum throughputs of all of the emission points of the source, ensuring that there is no question as to what the throughputs of the emission points or the source are.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading area, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanalamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year;

and

- (b) One (1) raw material liquid storage area including:

- (1) the Midwest Storage Area, **with a maximum design throughput of 7,501,859 gallons per year**, consisting of:

- (A) One (1) 342,005 gallon vertical raw material storage tank, identified as Tank 10, and  
(B) Two (1) 67,682 gallon vertical raw material storage tanks, identified as Tanks 11 and 12,

with the worst case material stored being propylene glycol.

- (2) Storage Area 2596, **with a maximum design throughput of 4,404,529 gallons per year**, consisting of:

- (A) Three (3) 81,218 gallon vertical raw material storage tanks, identified as Tanks 25, 26, and 27, and  
(B) Two (2) 22,533 gallon vertical raw material storage tanks, identified as Tanks 28 and 29,

with the worst case material stored being propylene glycol;

and

- (3) Storage Area 305-2, **with a maximum design throughput of 10,000,548 gallons per year**, including:

- (A) Tank Group 1, consisting of five (5) 81,218 gallon vertical raw material storage tanks, identified as Tanks 51, 52, 71, 72, and 73, with the worst case material stored being propylene glycol,  
(B) Tank Group 2, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 82, 83, 84, 85, 88, and 89, with the worst case material stored being 2-methoxyethanol,  
(C) Tank Group 3, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 54, 55, 56, 57, 58, and 59, with the worst case material stored being ethanol,  
(D) Tank Group 4, consisting of three (3) 67,682 gallon vertical raw material storage tanks, identified as Tanks 38, 39, and 40, with the worst case material stored being morpholine,  
(E) Tank Group 5, consisting of four (4) 7,520 gallon horizontal raw material storage tanks, identified as Tanks 45, 46, 47, and 48, with the worst case materials stored being propylene glycol for Tanks 45 and 46, 2-methoxyethanol for Tank 47, and ethanol for Tank 48,

- (F) Tank Group 6, consisting of six (6) 7,520 gallon horizontal storage tanks, identified as Tanks 49, 50, 60, 63, 65, and 66, with the worst case material stored being morpholine, and
- (G) Tank Group 7, consisting of seven (7) 7,520 gallon horizontal storage tanks, identified as Tanks 76, 77, 86, 87, 96, 97, and 98, with the worst case material stored being morpholine.

#### SECTION D.1 FACILITY OPERATION CONDITIONS

##### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading area, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year; and
- (b) One (1) raw material liquid storage area including:
  - (1) the Midwest Storage Area, **with a maximum design throughput of 7,501,859 gallons per year**, consisting of:
    - (A) One (1) 342,005 gallon vertical raw material storage tank, identified as Tank 10, and
    - (B) Two (1) 67,682 gallon vertical raw material storage tanks, identified as Tanks 11 and 12,with the worst case material stored being propylene glycol.
  - (2) Storage Area 2596, **with a maximum design throughput of 4,404,529 gallons per year**, consisting of:
    - (A) Three (3) 81,218 gallon vertical raw material storage tanks, identified as Tanks 25, 26, and 27, and
    - (B) Two (2) 22,533 gallon vertical raw material storage tanks, identified as Tanks 28 and 29,with the worst case material stored being propylene glycol; and
  - (3) Storage Area 305-2, **with a maximum design throughput of 10,000,548 gallons per year**, including:
    - (A) Tank Group 1, consisting of five (5) 81,218 gallon vertical raw material storage tanks, identified as Tanks 51, 52, 71, 72, and 73, with the worst case material stored being propylene glycol,
    - (B) Tank Group 2, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 82, 83, 84, 85, 88, and 89, with the worst case material stored being 2-methoxyethanol,

- (C) Tank Group 3, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 54, 55, 56, 57, 58, and 59, with the worst case material stored being ethanol,
- (D) Tank Group 4, consisting of three (3) 67,682 gallon vertical raw material storage tanks, identified as Tanks 38, 39, and 40, with the worst case material stored being morpholine,
- (E) Tank Group 5, consisting of four (4) 7,520 gallon horizontal raw material storage tanks, identified as Tanks 45, 46, 47, and 48, with the worst case materials stored being propylene glycol for Tanks 45 and 46, 2-methoxyethanol for Tank 47, and ethanol for Tank 48,
- (F) Tank Group 6, consisting of six (6) 7,520 gallon horizontal storage tanks, identified as Tanks 49, 50, 60, 63, 65, and 66, with the worst case material stored being morpholine, and
- (G) Tank Group 7, consisting of seven (7) 7,520 gallon horizontal storage tanks, identified as Tanks 76, 77, 86, 87, 96, 97, and 98, with the worst case material stored being morpholine.

**3. Comment 3:**

Southern Indiana Chemical has proposed that the loading/unloading area be described as the loading/unloading "system".

**Response 3:**

Condition A.2 and Part (a) of Section D.1 shall be revised as requested.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading ~~area~~**system**, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year;

.....

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading ~~area~~**system**, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year; and

.....

**4. Comment 4:**

Southern Indiana Chemical has proposed that the overall storage area be described as the storage "system".

**Response 4:**

Condition A.2 and Part (a) of Section D.1 shall be revised as requested.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading system, identified as the Winston yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year;
- (b) One (1) raw material liquid storage ~~area~~**system** including:  
.....

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading system, identified as the Winston Yard, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanolamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year; and
- (b) One (1) raw material liquid storage ~~area~~**system** including:  
.....

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)**

#### **Source Background and Description**

Source Name: Southern Indiana Chemical Resources, LLC  
Source Location: 10600 Highway 62 in Charlestown, IN 47111  
County: Clark  
SIC Code: 4226  
FESOP No.: 019-16434-00110  
Permit Reviewer: SDF

The Office of Air Quality (OAQ) has reviewed a FESOP application from Southern Indiana Chemical Resources, LLC relating to the construction and operation of a new source.

#### **Request**

On November 6, 2002, Southern Indiana Chemical Resources, LLC submitted an application for a new stationary commercial liquid storage and transfer operation consisting of:

- (a) One (1) railcar/truck/barge liquid raw material loading/unloading area, loading and unloading methyl ethyl ketone (MEK), glycols, glycol ethers, alcohols, ethanalamines, surfactants, and other viscous organics with a maximum design throughput of 11,000,001 gallons per year;

and

- (b) One (1) raw material liquid storage area including:

- (1) the Midwest Storage Area, consisting of:

- (A) One (1) 342,005 gallon vertical raw material storage tank, identified as Tank 10, and
    - (B) Two (1) 67,682 gallon vertical raw material storage tanks, identified as Tanks 11 and 12,

with the worst case material stored being propylene glycol.

- (2) Storage Area 2596, consisting of:

- (A) Three (3) 81,218 gallon vertical raw material storage tanks, identified as Tanks 25, 26, and 27, and
    - (B) Two (2) 22,533 gallon vertical raw material storage tanks, identified as Tanks 28 and 29,

with the worst case material stored being propylene glycol;

and

- (3) Storage Area 305-2, including:



- (A) Tank Group 1, consisting of five (5) 81,218 gallon vertical raw material storage tanks, identified as Tanks 51, 52, 71, 72, and 73, with the worst case material stored being propylene glycol,
- (B) Tank Group 2, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 82, 83, 84, 85, 88, and 89, with the worst case material stored being 2-methoxyethanol,
- (C) Tank Group 3, consisting of six (6) 27,167 gallon vertical raw material storage tanks, identified as Tanks 54, 55, 56, 57, 58, and 59, with the worst case material stored being ethanol,
- (D) Tank Group 4, consisting of three (3) 67,682 gallon vertical raw material storage tanks, identified as Tanks 38, 39, and 40, with the worst case material stored being morpholine,
- (E) Tank Group 5, consisting of four (4) 7,520 gallon horizontal raw material storage tanks, identified as Tanks 45, 46, 47, and 48, with the worst case materials stored being propylene glycol for Tanks 45 and 46, 2-methoxyethanol for Tank 47, and ethanol for Tank 48,
- (F) Tank Group 6, consisting of six (6) 7,520 gallon horizontal storage tanks, identified as Tanks 49, 50, 60, 63, 65, and 66, with the worst case material stored being morpholine, and
- (G) Tank Group 7, consisting of seven (7) 7,520 gallon horizontal storage tanks, identified as Tanks 76, 77, 86, 87, 96, 97, and 98, with the worst case material stored being morpholine.

The emissions generated by the proposed source are volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions generated from storage and loading/unloading.

The source VOC, single HAP, and combined HAP unrestricted potential to emit (UPTE) are estimated to be 57.09, 23.91, and 53.30 tons per year, respectively.

Since the VOC emissions are less than the Prevention of Significant Deterioration (PSD) level of 250 tons per year, the source will not be required to undergo PSD review pursuant to 40 CFR 52.21 and 326 IAC 2-2.

Since the source VOC emissions are less than 100 tons/yr and the single and combined HAP emissions will be limited to less than their respective levels of 10 and 25 tons per year, the source will be issued a FESOP pursuant to 326 IAC 2-8.

Based on the actual usage description of the permit it is determined that the actual source VOC and single and combined HAP emissions without the use of emission controls, will be less than the applicable levels specified in Permit By Rule under 326 IAC 2-10. The source may therefore qualify and apply for Permit By Rule under 326 IAC 2-10 provided that the:

- (a) source VOC emissions are limited to less than 20 tons per year,
- (b) worst case single HAP emissions are limited to less than 2 tons per year,
- (c) combined HAP emissions are limited to less than 5 tons per year, and
- (d) owner or operator has at least twelve (12) months worth of actual emissions data demonstrating that the applicable pollutant levels are less than the levels specified in (a), (b), and (c).

### Existing Approvals

This permit will be the first source operating permit. Southern Indiana Chemical is leasing the tank area of a decommissioned army munitions plant.

### Recommendation

The staff recommends to the Commissioner that this FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

## Emission Calculations

### 1. Unrestricted Potential to Emit (UPTE) Due to the Modification:

The unrestricted potential to emit (UPTE) due to the proposed modification are the VOC, and the single and combined HAP emissions from the loading/unloading and storage areas.

#### a. VOC Emissions:

##### A. Loading/Unloading Area:

The following calculations determine the loading/unloading area VOC UPTE based on the worst case methodology (emissions determined from the Y forms), the maximum hourly emission rates, emissions before controls, and 8760 hours of operation.

$$\text{Tons/yr} = \text{lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ lb/ton}$$

Material	lb/hr	tons/yr
Benzene	neg.	neg.
Cumene	neg.	neg.
Diethanolamine	0.01	0.04
Ethylbenzene	neg.	neg.
Ethylene Glycol	0.01	0.04
Methanol	5.46	23.91
MEK	5.46	23.91
MIK	0.20	0.88
Styrene	0.20	0.88
Toluene	0.20	0.88
Xylene	0.20	0.88
Glycol Ethers	0.43	1.88
Propylene Glycol	0.001	0.004
Ethanol	0.16	0.69
Morpholine	0.09	0.40
Total		54.39

##### B. Storage Tanks:

The following table lists the VOC UPTE from the storage tanks as determined using the EPA Tanks program.

Tank	tons/yr
10	0.016
11	0.003
12	0.003
25	0.003
26	0.003
27	0.003
28	0.001
29	0.001
51	0.002
52	0.002
71	0.002
72	0.002
73	0.002
88	0.028
89	0.028
82	0.028
83	0.028
84	0.028
85	0.028
54	0.200
55	0.200
56	0.200
57	0.200
58	0.200
59	0.200
38	0.238
39	0.238
40	0.238
45	neg.
46	neg.
47	0.008
48	0.059
49	0.029
50	0.029

60	0.029
63	0.029
65	0.029
66	0.029
76	0.048
77	0.048
86	0.048
87	0.048
96	0.048
97	0.048
98	0.048
<b>Total</b>	<b>2.702</b>

**b. HAP Emissions:**

The following calculations determine the loading/unloading area HAP UPTE based on the worst case methodology (emissions determined from the Y forms), the maximum hourly emission rates, emissions before controls, and 8760 hours of operation.

$$\text{Tons/yr} = \text{lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ lb/ton}$$

Material	lb/hr	tons/yr
Benzene	neg.	neg.
Cumene	neg.	neg.
Diethanolamine	0.01	0.04
Ethylbenzene	neg.	neg.
Ethylene Glycol	0.01	0.04
Methanol	5.46	<b>23.91</b>
MEK	5.46	<b>23.91</b>
MIK	0.20	0.88
Styrene	0.20	0.88
Toluene	0.20	0.88
Xylene	0.20	0.88
Glycol Ethers	0.43	1.88
<b>Total</b>		<b>53.30</b>

**2. Emissions After Controls:**

The emissions are uncontrolled.

### 3. Limited Emissions:

The source single and combined HAP emissions shall be limited to less than 10 and 25 tons per year, respectively. Since the HAPs are VOCs, the source VOC emissions will also be reduced to less than 25 tons per year.

#### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO <sub>2</sub>	-
VOC	57.09
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Single HAP	23.91
Combined HAP	53.30

The source VOC emissions are less than 100 tons/yr and the single and combined HAP emissions will be limited to less than their respective levels of 10 and 25 tons per year. Therefore, the source will be issued a FESOP pursuant to 326 IAC 2-8.

#### County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Clark County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

New Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	-	-	-	-	<25	-	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source single and combined HAP emissions shall be limited to less than 10 and 25 tons per year, respectively. Since the HAPs are VOCs, the VOC emissions will also be reduced to less than 25 tons per year.
- (b) This new source is not a major PSD stationary source because the VOC emissions are less than the applicable level or 250 tons per year or more and it is not one of the 28 listed source categories.
- (c) This new source is not a Title V major stationary source because the VOC emissions are less than the applicable level of 100 tons per year and the single and combined HAP emissions are limited to less than the applicable levels of 10 and 25 tons per year, respectively.

### Federal Rule Applicability

#### (a) New Source Performance Standards (NSPS):

##### (1) 40 CFR 60, Subparts K, Ka, and Kb (Storage Tank Requirements):

The requirements of 40 CFR 60, Subparts K, Ka, and Kb do not apply to the source tanks because the tanks were constructed in 1942. These tanks predate the applicable dates of all three rules.

##### (2) 40 CFR 60.500 - 60.506, Subpart XX (Bulk Gasoline Terminals):

The requirements of 40 CFR 60, Subpart XX do not apply to the proposed raw material loading/unloading terminal because the terminal is not a bulk gasoline terminal. This terminal does not handle gasoline.

**(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):**

**40 CFR 63.420 - 63.429, Subpart R (Gasoline Distribution Facilities):**

The requirements of 40 CFR 63, Subpart R do not apply to the proposed raw material loading/unloading terminal because the terminal is not a bulk gasoline terminal. This terminal does not handle gasoline.

**State Rule Applicability, Entire Source**

**1. 326 IAC 2-2 (Prevention of Significant Deterioration)**

The proposed modification is not a major PSD modification because none of the regulated pollutants exceed the respective major source levels.

**2. 326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new source, process, or emission unit which is constructed after July 27, 1997 and has single and combined HAP potential to emit (PTE) greater than 10 and 25 tons per year, respectively, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

The proposed source is not subject to the requirements of 326 IAC 2-4.1-1 because the single and combined HAP emissions are limited to less than the applicable levels.

To establish the limit and demonstrate compliance with the single and combined HAP limit, the following conditions shall be incorporated into the permit.

The following condition shall be added to emission limits and standards division of Section D.1 to establish the HAP limits.

**D.1.1 Single and Combined Hazardous Air Pollutant (HAP) Limits [326 IAC 2-4.1]**

**The owner or operator shall limit the source input single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance being demonstrated at the end of each month.**

The following condition shall be added to the compliance determination division of Section D.1 to establish the determination requirements.

**D.1.3 Compliance Determination, Single and Combined HAP Limits**

**To determine compliance with the limits of Condition D.1.1, the owner or operator shall, on a monthly basis:**

**(a) for the loading/unloading area:**

- (1) draft a list of each HAP containing material handled, including for each material, a list of the individual HAPs, and**
- (2) for the individual HAPs listed, determine the emissions for the affected month;**

**(b) for each of the source tanks:**

- (1) draft a list of each HAP containing material handled, including for each material, a list of the individual HAPs, and**
- (2) for the individual HAPs listed, determine the emissions for the affected month;**
- (c) determine the sum total individual HAP emissions from the loading/unloading area and storage tanks generated during the affected month;**
- (d) determine the combined HAP emissions from the loading/unloading area and storage tanks generated during the affected month;**
- (e) determine the sum total individual HAP emissions from the loading/unloading area and storage tanks generated during the 11 months preceding the most recent affected month;**
- (f) determine the sum total combined HAP emissions from the loading/unloading area and storage tanks generated during the 11 months preceding the most recent affected month;**
- (g) determine the consecutive 12 month total for each individual HAP by summing the values determined in Parts (c) and (e) of this Condition;**
- (h) determine from the values estimated in Part (g) of this Condition, the highest (worst case) consecutive 12 month total individual HAP emissions; and**
- (i) determine the consecutive 12 month total combined HAP emissions by summing the values estimated in Parts (d) and (f) of this Condition.**

The following condition shall be added to the compliance monitoring division of Section D.1 to establish the monitoring requirements.

**D.1.5 Compliance Monitoring, Single and Combined HAP Limits**

**To demonstrate compliance with the requirements of Condition D.1.1, the owner or operator shall record the information and values determined in Condition D.1.3.**

The following conditions shall be added to the record keeping and reporting division of Section D.1 to establish the record keeping and reporting requirements associated with the single and combined HAP limits.

**D.1.6 Record Keeping, Single and Combined HAP Limits**

**To demonstrate compliance with the requirements of Condition D.1.1, the owner or operator shall keep and maintain:**

- (a) records of the information and specific values required in Condition D.1.5; and**
- (b) copies of the emission calculations performed each month including the methods used, a list of all parameters used to determine the emissions, material safety data sheets (MSDS) for all materials stored and handled, and all supporting documentation used to verify the amount of each material, including as applicable, purchase and shipping orders and invoices.**



**All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**D.1.8 Reporting Requirements, Single and Combined HAP limits**

To document compliance with the requirements of Condition D.1.1, the owner or operator shall submit a quarterly summary of the information required in Condition D.1.6. Said summary shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**3. 326 IAC 2-6 (Emission Reporting)**

This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting) because the VOC potential to emit exceeds the applicable level of 10 tons per year.

**4. 326 IAC 2-8-4(9) ( Preventive Maintenance Plan)**

The source is subject to the preventive maintenance plan (PMP) requirements of 326 IAC 2-8-4(9).

**5. 326 IAC 4-1 (Open Burning)**

The source is subject to the requirements of 326 IAC 4-1.

**6. 326 IAC 4-2 (Incineration)**

The source is subject to the requirements of 326 IAC 4-2.

**7. 326 IAC 6-4 (Fugitive Particulate Emissions)**

The source is subject to the requirements of 326 IAC 6-4.

**8. 326 IAC 6-5 (Nonattainment Area Fugitive Particulate Emissions)**

The requirements of 326 IAC 6-5 do not apply because the source fugitive particulate emissions are less than the applicable level of 25 tons per year.

**State Rule Applicability - Individual Facilities**

**1. 326 IAC 8-4:**

The source emissions units are subject to 326 IAC 8-4 review because the source is located in Clark County, one of the applicable counties specified in 326 IAC 8-4-1(a).

**(a) 326 IAC 8-4-1 (Applicability)**

326 IAC 8-4-1 lists the criteria which establishes applicability to the rule. This part does not contain any requirements.

**(b) 326 IAC 8-4-2 (Refineries)**

The requirements of 326 IAC 8-4-2 do not apply to the emission units of the source because the source is not a refinery.

**(c) 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)**

The requirements of 326 IAC 8-4-3 do not apply to any of the source tanks because each tank's true vapor pressure is less than the applicable pressure of 1.52 psi.

**(d) 326 IAC 8-4-4 (Bulk Gasoline Terminals)**

The requirements of 326 IAC 8-4-4 do not apply to the source loading/unloading area because the terminal does not handle gasoline.

**(e) 326 IAC 8-4-5 (Bulk Gasoline Plant)**

The requirements of 326 IAC 8-4-5 do not apply to the emission units of the source because the source is not a bulk gasoline plant.

**(f) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)**

The requirements of 326 IAC 8-4-6 do not apply to the source loading/unloading area because the loading/unloading area does not handle gasoline.

**(g) 326 IAC 8-4-7 (Gasoline Transports)**

The requirements of 326 IAC 8-4-7 do not apply to the raw material transports because the transports do not handle gasoline.

**(h) 326 IAC 8-4-8 (Leaks from Petroleum Refineries)**

The requirements of 326 IAC 8-4-8 do not apply to the emission units of the source because the source is not a refinery.

**(i) 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)**

The requirements of 326 IAC 8-4-9 do not apply because none of the emission units or transports are subject to the requirements of 326 IAC 8-4-4 through 8-4-7.

**2. 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)**

While the source is located in one of the applicable counties (Clark), the requirements of 326 IAC 8-7 do not apply because the source VOC UPTE (57.09 tons/yr) is less than the applicable level of 100 tons per year.

**3. 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)**

The storage tanks are subject to 326 IAC 8-9 review because the tanks are located in Clark County.

**(a) 326 IAC 8-9-1(b) Requirements:**

Pursuant to 326 IAC 8-9-1(b), storage vessels with a capacity less than 39,000 gallons are subject to the requirements of 326 IAC 8-9-6(a) and (b) only.

Tanks 28 and 29 each have a capacity of 22,533 gallons, Tanks 88, 89, 82, 83, 84, 85, 54, 55, 56, 57, 58, and 59 each have a capacity of 27,167 gallons, and Tanks 45, 46, 47, 48, 49, 50, 60, 63, 65, 66, 76, 77, 86, 87, 96, 97, and 98 each have a capacity of 7,520 gallons. The capacities of these tanks are less than the applicable level of 39,000 gallons. Therefore, only the requirements of 326 IAC 8-9-6(a) and (b) apply to these tanks.

**(b) 326 IAC 8-9-1(c) Requirements:**

Pursuant to 326 IAC 8-9-1(c), storage vessels with a capacity equal to or greater than 39,000 gallons that store a volatile organic liquid with a maximum true vapor pressure greater than or equal to 0.5 psi but less than 0.75 psi are only subject to the requirements of 326 IAC 8-9-6(a), (b), (g), and (h).

Tank 10 has a capacity of 342,000 gallons, Tanks 11 and 12 each have a capacity of 67,682 gallons, Tanks 25, 26, 27, 51, 52, 71, 72, and 73 each have a capacity of 81,218 gallons, and Tanks 38, 39, and 40 each have a capacity of 67,682 gallons.

Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, and 73 each have a maximum true vapor pressure of 0.0008 psi, and Tanks 38, 39, and 40 each has a maximum true vapor pressure of 0.0952 psi.

The capacities of these tanks are greater than the applicable level of 39,000 gallons, but less than the low end level of 0.5 psi. Therefore, the applicable requirements specified in 326 IAC 8-9-1(c) do not apply to these tanks.

Since the requirements of 326 IAC 8-9 apply but the specific applicable requirements of 326 IAC 8-9-1(b) and (c) do not apply, the individual requirements must be reviewed to determine applicability. The results of the review are as follows:

**(1) 326 IAC 8-9-2:**

326 IAC 8-9-2 lists the vessels that are exempt from 326 IAC 8-9. None of the tanks of the proposed source are exempted under 326 IAC 8-9-2.

**(2) 326 IAC 8-9-3:**

326 IAC 8-9-3 consists of definitions, not requirements, and does not have any impact on the emission units of the proposed source.

**(3) 326 IAC 8-9-4:**

**(A) 326 IAC 8-9-4(a):**

The requirements of 326 IAC 8-9-4(a) apply to all tanks with a capacity greater than or equal to 39,000 gallons, that stores a VOL with a maximum true vapor pressure greater than or equal to 0.75 psi but less than 11.1 psi.

The capacity of Tank 10 is 342,000 gallons, Tanks 11 and 12 each have a capacity of 67,682 gallons, Tanks 25, 26, 27, 51, 52, 71, 72, and 73, each have a capacity of 81,218 gallons, and Tanks 38, 39, and 40, each have a capacity of 67,682 gallons.

Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, and 73, each have a maximum true vapor pressure of 0.0008 psi, and Tanks 38, 39, and 40 each have a true vapor pressure of 0.0952 psi.

While the capacities of the tanks are greater than the applicable level of 39,000 gallons, the maximum true vapor pressures are less than the low end applicable pressure of 0.75 psi. Therefore, the requirements of 326 IAC 8-9-4(a) do not apply.

**(B) 326 IAC 8-9-4(b):**

The requirements of 326 IAC 8-9-4(b) apply to all tanks with a capacity greater than or equal to 39,000 gallons, that stores a VOL with a true vapor pressure greater than or equal to 11.1 psi.

The capacity of Tank 10 is 342,000 gallons, Tanks 11 and 12 each have a capacity of 67,682 gallons, Tanks 25, 26, 27, 51, 52, 71, 72, and 73, each have a capacity of 81,218 gallons, and Tanks 38, 39, and 40, each have a capacity of 67,682 gallons.

Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, and 73, each have a maximum true vapor pressure of 0.0008 psi, and Tanks 38, 39, and 40 each have a true vapor pressure of 0.0952 psi.

While the capacities of the tanks are greater than the applicable level of 39,000 gallons, the maximum true vapor pressures are less than the applicable pressure of 11.1 psi. Therefore, the requirements of 326 IAC 8-9-4(b) do not apply.

**(C) 326 IAC 8-9-4(c):**

The requirements of 326 IAC 8-9-4 (c) apply to tanks with an internal floating roof.

The requirements of 326 IAC 8-9-4(c) do not apply because none of the tanks have an internal floating roof.

**(D) 326 IAC 8-9-4(d):**

The requirements of 326 IAC 8-9-4(d) apply to all tanks equipped with or required to be equipped with a closed vent system and control device.

The requirements of 326 IAC 8-9-4(d) do not apply because none of the tanks are equipped with or required to have a closed vent system and control device.

**(E) 326 IAC 8-9-4(e):**

The requirements of 326 IAC 8-9-4 (e) apply to tanks with an external floating roof.

The requirements of 326 IAC 8-9-4(e) do not apply because none of the tanks have an external floating roof.

**(4) 326 IAC 8-9-5:**

The requirements of 326 IAC 8-9-5 apply to each vessel subject to the requirements of 326 IAC 8-9-4(a).

The requirements of 326 IAC 8-9-5 do not apply to the tanks because none of the tanks are subject to the requirements of 326 IAC 8-9-4(a).

**(5) 326 IAC 8-9-6:**

**(A) 326 IAC 8-9-6(a) and (b):**

The requirements of 326 IAC 8-9-6(a) and (b) apply to all tanks subject to the requirements of 326 IAC 8-9.

All of the tanks, including the tanks that are not specified in 326 IAC 8-9-1(b) and (c), are subject to 326 IAC 8-9 review. Therefore, 326 IAC 8-9-6(a) and (b) apply to all of the source tanks.

**(B) 326 IAC 8-9-6(c):**

The requirements of 326 IAC 8-9-6(c) apply to all tanks with both a permanently affixed roof and internal floating roof.

The tanks are not subject to the requirements of 326 IAC 8-9-6(c) because none of the tanks have an internal floating roof.

**(C) 326 IAC 8-9-6(d):**

The requirements of 326 IAC 8-9-6(d) apply to all tanks with an external floating roof.

The tanks are not subject to the requirements of 326 IAC 8-9-6(d) because none of the tanks have an external floating roof.

**(E) 326 IAC 8-9-6(e) and (f):**

The requirements of 326 IAC 8-9-6(e) and (f) apply to all tanks equipped with a closed vent system with a control device.

The tanks are not subject to the requirements of 326 IAC 8-9-6(e) and (f) because none of the tanks are equipped with or required to have a closed vent system with a control device.

**(G) 326 IAC 8-9-6(g):**

The requirements of 326 IAC 8-9-6(g) apply to all tanks with a design capacity greater than or equal to 39,000 gallons, with a maximum true vapor pressure greater than or equal to 0.5 psi but less than 0.75 psi.

The capacity of Tank 10 is 342,000 gallons, Tanks 11 and 12 each have a capacity of 67,682 gallons, Tanks 25, 26, 27, 51, 52, 71, 72, and 73, each have a capacity of 81,218 gallons, and Tanks 38, 39, and 40, each have a capacity of 67,682 gallons.

Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, and 73, each have a maximum true vapor pressure of 0.0008 psi, and Tanks 38, 39, and 40 each have a true vapor pressure of 0.0952 psi.

While the capacities of the tanks are greater than the applicable level of 39,000 gallons, the maximum true vapor pressures are greater than the lower end applicable pressure of 0.5 psi. Therefore, the requirements of 326 IAC 8-9-6(g) do not apply.

**(H) 326 IAC 8-9-6(h):**

The requirements of 326 IAC 8-9-6(h) apply to all tanks with a capacity greater than or equal to 39,000 gallons that normally store VOLs with maximum true vapor pressures less than 0.75 psi.

The capacity of Tank 10 is 342,000 gallons, Tanks 11 and 12 each have a capacity of 67,682 gallons, Tanks 25, 26, 27, 51, 52, 71, 72, and 73, each have a capacity of 81,218 gallons, and Tanks 38, 39, and 40, each have a capacity of 67,682 gallons.

Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, and 73, each have a maximum true vapor pressure of 0.0008 psi, and Tanks 38, 39, and 40 each have a true vapor pressure of 0.0952 psi.

The capacities of these tanks are greater than the applicable capacity of 39,000 gallons and the maximum true vapor pressures are less than the applicable pressure of 0.75 psi. Therefore, the requirements of 326 IAC 8-9-6(h) apply to the tanks.

**(I) 326 IAC 8-9-6(i):**

326 IAC 8-9-6(i) lists the methods that can be used to determine the true vapor pressure. These methods apply to the tanks because there are no applicability criteria.

While 326 IAC 8-9-1(b) exempts Tanks 28, 29, 88, 89, 82, 83, 84, 85, 54, 55, 56, 57, 58, 59, 45, 46, 47, 48, 49, 50, 60, 63, 65, 66, 76, 77, 86, 87, 96, 97, and 98 from all requirements under 326 IAC 8-9 except 326 IAC 8-9-6(a) and (b), the methods specified in 326 IAC 8-9-6(i) can be applied to these tanks as well because the methods of 326 IAC 8-9-6(i) are "suggested" methods, not "required" methods.

**(J) 326 IAC 8-9-6(j):**

The requirements of 326 IAC 8-9-6(j) apply to tanks that store a waste mixture of indeterminate or variable composition.

The requirements of 326 IAC 8-9-6(j) do not apply to any of the source tanks because no waste mixtures are stored in the tanks.

Based on the above determinations, the 326 IAC 8-9-6 requirements shall be incorporated into the permit as follows:

The following condition shall be added to the compliance determination division of Section D.1 to permit the use of the methods specified in 326 IAC 8-9-1(i) if the source chooses to.

**D.1.4 True Vapor Pressure Determination Methods [326 IAC 8-9-6(i)]**

**Where applicable, the owner or operator may use available data on the storage temperature to determine the maximum true vapor for the purposes of Condition D.1.7(b) provided the owner or operator, as applicable, complies with the following requirements:**

- (a) The maximum true vapor pressure for VOLs stored at temperatures above or below the ambient temperature shall correspond to the highest calendar-month average storage temperature. The maximum true vapor pressure for VOLs stored at the ambient temperature shall correspond to the local maximum monthly average temperature, as reported by the National Weather Service.**
- (b) For local crude oil or refined petroleum products, the maximum true vapor pressure may be determined as follows:**
  - (1) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517\* unless the Office of Air Quality specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the samples.**
  - (2) The maximum true vapor pressure of each type of crude oil with a Reid vapor pressure less than two (2) pounds per square inch or with physical properties that preclude determination by the recommended method shall be determined from available data and recorded if the estimated maximum true vapor pressure is greater than five-tenths (0.5) psia.**
- (c) For other liquids, the maximum true vapor pressure may be determined by any of the following methods:**
  - (1) Standard reference texts.**
  - (2) ASTM Method D2879-92\*.**
  - (3) Calculated or measured by a method approved by the Office of Air Quality.**

**\* Copies of the Code of Federal Regulations (CFR), ASTM Method D2879-92, ASTM Method D323-82, and API Bulletin 2517 referenced may be obtained from the Government Printing Office, Washington, D.C. 20402 or the Indiana Department of Environmental Management, Indiana Government Center-North, 100 North Senate Avenue, Indianapolis, Indiana 46204-2220.**

The following condition shall be added to the record keeping division of Section D.1 to establish the applicable 326 IAC 8-9-6(a), (b), and (h) requirements.

**D.1.7 Record Keeping, Storage Tanks [326 IAC 8-9-6(a) and (b)], [326 IAC 8-9-6(h)]**

**(a) The owner or operator shall, for each tank at the source, keep and maintain a record consisting of the following information:**

- (1) the vessel identification number,**
- (2) the vessel dimensions, and**
- (3) the vessel capacity.**

**Said records shall be kept for the life of the vessel.**

**(b) The owner or operator shall, for all periods when the true vapor pressure of Tanks 10, 11, 12, 25, 26, 27, 51, 52, 71, 72, 73, 38, 39, and 40 exceed 0.75 psia:**

- (1) keep and maintain a record of each event, and**
- (2) notify the department within 30 days of each event, that the true vapor pressure has exceeded 0.75 psia.**

The following condition shall be added to the record keeping and reporting division of Section D.1 to establish the reporting required in 326 IAC 8-9-6(b).

**D.1.9 Reporting, Storage Tanks [326 IAC 8-9-6(b)]**

**The owner or operator shall submit a report containing the information required in Condition D.1.7(a).**

**3. 326 IAC 8-1-6 (General Reduction Requirements)**

Pursuant to 326 IAC 8-1-6, sources that are subject to any other rule under 326 IAC 8, are not subject to the requirements of 326 IAC 8-1-6.

Since the proposed storage tanks and loading/unloading area are subject to the requirements of 326 IAC 8-9, the requirements of 326 IAC 8-1-6 do not apply.

**4. 326 IAC 8-6 (Organic Solvent Emission Limitations)**

Pursuant to 326 IAC 8-6-1(1) and (2), sources that are subject to any other rule under 326 IAC 8, are not subject to the requirements of 326 IAC 8-6.

Since the proposed storage tanks and loading/unloading area are subject to the requirements of 326 IAC 8-9, the requirements of 326 IAC 8-6 do not apply.

**Conclusion**

The proposed commercial liquid storage and transfer operation shall be constructed and operated according to the requirements specified in FESOP 019-16434-00110.